1	Stan S. Mallison (SBN 184191)	
2	Hector R. Martinez (SBN 206336) Marco A. Palau (SBN 242340)	
3	Joseph D. Sutton (SBN 269951) MALLISON & MARTINEZ	
	1939 Harrison Street, Suite 730	
4	Oakland, California 94549 Telephone: 510.832.9999	
5	Facsimile: 510.832.1101 stanm@themmlawfirm.com	
6	hectorm@themmlawfirm.com	
7	mpalau@themmlawfirm.com jsutton@themmlawfirm.com	
8	Attorneys for PLAINTIFFS	
9	Attorneys for Plaintiff	
10	MARLÈNE S. MURACO, Bar No. 154240 mmuraco@littler.com	
	GINA M. CHANG, Bar No. 260747	
11	gchang@littler.com LITTLER MENDELSON, P.C.	
12	50 W. San Fernando, 15th Floor	
13	San Jose, California 95113.2303 Telephone: 408.998.4150	
14	Facsimile: 408.288.5686 Attorneys for Defendants,	
	JOHN ÉARL REDFERN, J. REDFERN, INC	
15	dba GOLDEN STATE LANDSCAPING; JL PARTNERS, INC., dba GSL CONSTRUCTI	
16	EMPIRE LANDSCAPE CONSTRUCTION	
17	UNITED STATES DISTRICT COURT	
18	NORTHERN DISTRICT OF CALIFORNIA	
19	SAN FRANCISCO DIVISION	
20		
21	MARCOS VARGAS, ROMUALDO ALTAMIRANO, PEDRO RAMOS,	Case No. C-12-04052-CRB
	BULMARO BAZAN, MARCOS	JOINT STIPULATION AND ORDER
22	MANDUJANO, JOSE: SOLIS, LUIS PENA, BENITO CHAIREZ, FIGUEROA,	REGARDING RESPONSIVE PLEADING TO THE COMPLAINT PURSUANT TO
23	FREDY ROCHA, SALVADOR FLORES, ISMAEL CORONA, EPIGMENIO	LOCAL RULE 6-1
24	LOPEZ, JUAN CORONA, ENRIQUE	
25	TAMAYO, FRANCISCO SALGADO, SILVERIO TORRES, MARTIN RAMOS	
	RAMIREZ, ANGEL SANCHEZ, ERON	
26	LOPEZ, EDUARDO VARGAS, JORGE SOTO, RIGOBERTO SANCHEZ:, JULIO	
27	LOPEZ, JOSE J. GARCIA, PEDRO SIERRA, DAMACIO SANCHEZ, JUAN	
28	GUERRA, JAIME MARTINEZ JR.,	

LITTLER MENDELSON, P.C. 50 W. San Fernando, 15th Floor San Jose, CA 95113.2303 408.998.4150 JOINT STIP. AND [PROPOSED] ORDER REGARDING RESPONSE TO COMPLAINT

1 ROBERT MONTOYA, MATEO GUZMAN, LAZARO MAYA, JOSE 2 ESTRADA, ANICETO ALMANZA SANCHEZ, EMILIO VARGAS, JOSE 3 ANTONIO ALVAREZ, ANTONIO RODRIGUEZ, JOSEPH RENEE 4 RODRIGUEZ, MAURICIO SANCHEZ, MAURICIO SANCHEZ ARZATE, 5 MANUEL RENTERIA, MIGUEL SUCHIL MENDOZA, and VICENTE 6 MARTINEZ, individually and on behalf of all others similarly situated, 7

Plaintiffs,

V.

JOHN EARL REDFERN, an individual; J. REDFERN, INC., (dba "GOLDEN STATE LANDSCAPING"), a California Corporation; JLS PARTNERS, INC., (dba "GSL CONSTRUCTION"), a California Corporation; and EMPIRE LANDSCAPE CONSTRUCTION, a California Corporation,

Defendants.

15

16

17

18

19

20

21

22

23

24

25

26

27

8

9

10

11

12

13

14

Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres, Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez, Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez, (collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction (collectively "Defendants") agree and stipulate, through their respective counsel, to the following extension:

28

- 1. The parties are currently finalizing a settlement, and thus, they would like to direct their resources and time to settlement discussions.
- 2. The settlement involves over forty individual plaintiffs and a proposed class settlement of a related state action, which is why it is taking quite a bit of time to finalize.
- 3. The parties would like another four weeks to continue to discuss settlement, and have agreed to extend by six weeks, from April 12, 2013 to May 24, 2013, Defendants' responsive pleading to Plaintiffs' complaint.
- 3. The parties also request that the initial Case Management Conference, which is scheduled for May 10, 2013, also be postponed by four weeks to June 7, 2013.

THEREFORE, the parties hereby stipulate and request that this Court order the following:

- 1. The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint is set for May 24, 2013.
 - 2. The Case Management Conference be scheduled for June 14, 2013 at 8:30 a.m..

1	Dated: April 11, 2013	
2		/n/M A. D
3		/s/ Marco A. Palau MARCO A. PALAU
4		LAW OFFICES OF MALLISON & MARTINEZ
5		Attorneys for Plaintiffs MARCOS VARGAS, ROMUALDO
		ALTAMIRANO, PEDRO RAMOS,
6		BULMARO BAZAN, MARCOS
7		MANDUJANO, JOSE: SOLIS, LUIS PENA, BENITO CHAIREZ, FIGUEROA, FREDY
8		ROCHA, SALVADOR FLORES, ISMAEL
9		CORONA, EPIGMENIO LOPEZ, JUAN
9		CORONA, ENRIQUE TAMAYO, FRANCISCO SALGADO, SILVERIO
10		TORRES, MARTIN RAMOS RAMIREZ,
11		ANGEL SANCHEZ, ERON LOPEZ,
12		EDUARDO VARGAS, JORGE SOTO, RIGOBERTO SANCHEZ:, JULIO LOPEZ,
		JOSE J. GARCIA, PEDRO SIERRA,
13		DAMACIO SANCHEZ, JUAN GUERRA,
14		JAIME MARTINEZ JR., ROBERT MONTOYA, MATEO GUZMAN, LAZARO
15		MAYA, JOSE ESTRADA, ANICETO
		ALMANZA SANCHEZ, EMILIO VARGAS,
16		JOSE ANTONIO ALVAREZ, ANTONIO RODRIGUEZ, JOSEPH RENEE
17		RODRIGUEZ, MAURICIO SANCHEZ,
18		MAURICIO SANCHEZ ARZATE, MANUEL
10		RENTERIA, MIGUEL SUCHIL MENDOZA, and VICENTE MARTINEZ
19	Dated: April 11, 2013	
20		/s/ Marlene S. Muraco
21		MARLENE S. MURACO
22		LITTLER MENDELSON A Professional Corporation
23		Attorneys for Defendants JOHN EARL REDFERN, J. REDFERN, INC.,
24		dba GOLDEN STATE LANDSCAPING; JLS
25		PARTNERS, INC., dba GSL CONSTRUCTION, EMPIRE LANDSCAPE
26		CONSTRUCTION
27		
28		
ON, P.C.	JOINT STIP. AND [PROPOSED] ORDER	

IT IS SO ORDERED:

4 Dated: April 16, 20113

Firmwide:119703508.1 059436.1001

LITTLER MENDELSON, P.C. 50 W. San Fernando, 15th Floor San Jose, CA 95113.2303 408.998.4150 JOINT STIP. AND [PROPOSED] ORDER REGARDING RESPONSE TO COMPLAINT

5.

